UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

TEXTRON INC., a Delaware corporation,

Plaintiff,

v.

ONEBEACON AMERICA INSURANCE COMPANY, a Massachusetts corporation, as successor in interest to AMERICAN EMPLOYERS' INSURANCE COMPANY, COMMERCIAL UNION INSURANCE COMPANY, and EMPLOYERS' COMMERCIAL UNION COMPANIES,

Defendant.

1928 DPW Civil Action No.

FILING FEE PAID

RECEIPT # AMOUNTS

BY DPTY CLK

MOTION PURSUANT TO LOCAL DISTRICT COURT **RULE 83.5.3 FOR ADMISSION PRO HAC VICE**

Martin C. Pentz, a member in good standing of the Bar of this Court, and a member of the law firm of Nutter, McClennen & Fish LLP, hereby moves the Court to enter an order permitting Anna P. Engh to appear pro hac vice before the Court to represent the plaintiff in the above-captioned case. In support of this motion, undersigned counsel respectfully states as follows:

Ms. Engh is a member of the firm of Covington & Burling, which maintains an 1. office for the practice of law at 1201 Pennsylvania Avenue, N.W., Washington, D.C. 20004-2401.

- 2. I have attached a certificate of Ms. Engh as required by Local Rule 83.5.3(b). This certificate indicates that Ms. Engh is in full compliance with the requirements of the local rule for admission *pro hac vice*.
- 3. The undersigned counsel requests that this Court allow the motion so that Ms. Engh can file pleadings and appear and be heard at all proceedings in this case on behalf of the plaintiff.
- 4. I have appeared in this action on behalf of the plaintiff by signing the plaintiff's Complaint for Declaratory Relief, Damages and Attorneys' Fees and Jury Demand.

WHEREFORE, undersigned counsel respectfully requests that the Court enter an order permitting Anna P. Engh to appear *pro hac vice* in this case.

Respectfully submitted,

Martin C. Pentz (BBO # 394050) Nutter, McClennen & Fish, LLP World Trade Center West

155 Seaport Boulevard

Boston, MA 02210 Tel: (617) 439-2000

Fax: (617) 310-9000

Counsel for Plaintiff Textron Inc.

Dated: September 2, 2004

1358494.1

CERTIFICATE UNDER RULE 83.5.3

I, Anna P. Engh, hereby certify that (1) I am a member of the Bar in good standing in every jurisdiction where I have been admitted to practice; (2) there are no disciplinary proceedings against me as a member of the Bar in any jurisdiction; and (3) I am familiar with the Local Rules of the United States District Court for the District of Massachusetts. anna P. Engh

Dated: September [_, 2004

1268154.1